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20 **UNITED STATES DISTRICT COURT**

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CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

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YUNG KIM, on behalf of himself and
all others similarly situated,

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Plaintiff,

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vs.

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GENERAL MOTORS LLC and DOES
1 though 10, inclusive,

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Defendants.

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Case No. CV 11-06459 GAF (MRWx)

**STIPULATION FOR DISMISSAL
WITH PREJUDICE**

[Rule 41(a)(1)(A)(ii), F.R.Civ.P.]

Whereas, this action was brought as a putative class action, and plaintiff Yung Kim (“Plaintiff”) and defendant General Motors LLC (“GM”) are the only parties to have appeared in this case.

Whereas, following discovery and partial briefing on individual and class issues, Plaintiff and GM have reached an individual settlement, and Plaintiff seeks to dismiss the entire complaint.

Whereas, the terms of the settlement are confidential between the parties, but both parties represent that the consideration for the settlement was limited to the individual case. There was no consideration for the settlement that involved compensation to the Plaintiff, or payment of attorney fees and costs to Plaintiff's counsel, relating to class allegations.

Whereas, no aspect of this settlement precludes in any way other customers from bringing their own individual or class action lawsuit arising from the same allegations as were advanced by Plaintiff.

IT IS HEREBY STIPULATED, by and between Plaintiff and GM, by and through their respective counsel of record, pursuant to and in accordance with the terms of Rule 41(a)(1)(A)(ii), that Plaintiff's First Amended Complaint and the action are hereby dismissed with prejudice.

DATED: May 15, 2013

RICHARD D. MCCUNE
JAE (EDDIE) K. KIM
McCUNE WRIGHT LLP

By: /s/ Richard D. McCune

DANIEL H. CHANG
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1 EDWARD W. CHOI
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4 By: /s/ Edward W. Choi

5 Attorneys for Plaintiff
6 Yung Kim

7 DATED: May 15, 2013

8 GREGORY R. OXFORD
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10 By: /s/ Gregory R. Oxford

11 Attorneys for Defendant
12 General Motors LLC

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